

Exhibit 35

Page 14

1 - TARIQ SHAUKAT -
2 related to this case at any point in time?
3 A. I believe I searched -- in the course
4 of ER, the Employee Relations investigation, I
5 believe I searched for a couple of documents to
6 refresh my memory. I couldn't tell you which
7 documents they were. I do just have a
8 recollection of searching for some e-mails in
9 particular.

10 Q. Did you ever receive a -- what's
11 sometimes referred to as a litigation hold notice
12 in this case? Do you know what I'm referring to?

13 A. I -- I do know what you're referring
14 to. I received a lot of litigation holds in my
15 time at Google. I could not tell you I recall it
16 being specifically for this case at this time,
17 but -- but I have received litigation holds.

18 Q. Do you recall whether in response to
19 litigation holds, you ever changed the settings in
20 your Gmail or other systems to keep it from being
21 automatically deleted?

22 A. What -- in relation to litigation
23 holds, in general, that would have been my common
24 -- or the practice that I put in place when I
25 first received a litigation hold, but I don't have

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1 - TARIQ SHAUKAT -

2 any recollection specifically for this case.

3 Q. In the course of your employment at
4 Google, did you ever have occasion to text on
5 phones, personal devices, with employees or
6 individuals with whom you worked?

7 A. Not text in the -- in the form of SMS
8 messages. We did use Google Hangouts which I did
9 use from my phone similar to how I use e-mail from
10 my phone.

11 Q. Now, you know who Ulku Rowe is,
12 correct?

13 A. I do, yes.

14 Q. And you're aware that she's brought a
15 lawsuit against Google?

16 A. I am, yes.

17 Q. How did you become aware of that?

18 A. I believe I either read it in the
19 press or I was informed right before reading it in
20 the press by Mr. Cooper and his team. I can't
21 recall exactly.

22 MR. GAGE: I'm going to -- yeah,
23 again, I'm going to instruct you not to
24 discuss any conversations with counsel.

25 THE WITNESS: Okay.

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1 - TARIO SHAUKAT -

2 Q. So you learned of it sometime around
3 the time of its filing; is that correct?

4 A. Yes.

5 Q. And what is your understanding of
6 what this lawsuit is about?

7 A. My general understanding is it's in
8 relation to the role of head of financial services
9 in Google Cloud.

10 I apologize, the gardener just showed
11 up. Let me shut the door here. You may not be
12 able to hear, my apologies.

13 My understanding is it's in relation
14 to her applications for the head of financial
15 services for Google Cloud and the fact that she

| Age Group | Percentage of Respondents |
|-----------|---------------------------|
| 18-29 | 90% |
| 30-49 | 85% |
| 50-64 | 80% |
| 65+ | 60% |

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1 - TARIQ SHAUKAT -

3 Q. How old are you, Mr. Shaukat?

4 A. I'm [REDACTED].

5 Q. And what is your highest level of
6 education?

7 A. I have two Master's degrees; one in
8 mechanical engineering and the other in public
9 policy.

10 Q. And when did you graduate with your
11 second Master's?

12 A. That would be early 1997, either
13 January or February.

14 Q. And when -- and which Master's degree
15 was that?

16 A. That was the public policy degree.

17 Q. And when did you get your mechanical
18 engineering Master's?

19 A. 1995, June of 1995.

20 Q. And so did you go immediately from
21 your Master's in mechanical engineering to pursue
22 your Master's of public policy?

23 A. I did, yes.

24 Q. And when did you receive your
25 undergraduate degree?

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70 to 73

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|---|---|
| <p style="text-align: right;">Page 70</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 leadership staffing colleagues.</p> <p>2 Q. And was he within your organization</p> <p>3 or did he sit in HR or recruiting or --</p> <p>4 A. He sat in what's called the</p> <p>5 Leadership Staffing Team, which is part of</p> <p>6 the -- the HR organization in Google.</p> <p>7 Q. And he provides a list. Do you see</p> <p>8 that bullet-pointed list in bold?</p> <p>9 A. I do.</p> <p>10 Q. And are those positions that were in</p> <p>11 the process of being filled in your organization?</p> <p>12 A. Yes, that's right.</p> <p>13 Q. Okay, and then these charts below,</p> <p>14 those relate to particular positions within your</p> <p>15 organization, correct?</p> <p>16 A. That's right.</p> <p>17 Q. Okay, and so the financial services</p> <p>18 vertical lead, do you see that on Page 08?</p> <p>19 A. I do see it. I don't see a page</p> <p>20 number, but I do see --</p> <p>21 Q. I'm referring to the Bates number in</p> <p>22 the bottom right-hand corner.</p> <p>23 A. Yes. The -- the last two digits, 08,</p> <p>24 yes, I do see that.</p> <p>25</p> | <p style="text-align: right;">Page 72</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 Q. And what about Mr. Breslow's</p> <p>2 background made him an ideal candidate for</p> <p>3 that -- for that role?</p> <p>4 A. Stuart had been a longtime chief</p> <p>5 compliance officer to highly-respected</p> <p>6 financial institutions in the field of compliance</p> <p>7 specifically, so Morgan Stanley and then Credit</p> <p>8 Suisse.</p> <p>9 Before that he also had been a</p> <p>10 partner, subsequent to those experiences, at</p> <p>11 McKinsey focusing specifically on topics such as</p> <p>12 anti-money laundering, which was a very</p> <p>13 high-interest area for us from a product</p> <p>14 standpoint as well and so he -- and so he had both</p> <p>15 the -- and he had published a paper, I recall is</p> <p>16 the way we found him, on anti-money laundering</p> <p>17 that was quite influential on how we were thinking</p> <p>18 about the anti-money laundering space.</p> <p>19 Q. Didn't he actually come to be known</p> <p>20 to Google through Ruth Porat?</p> <p>21 A. He did not, no. At least, not to my</p> <p>22 knowledge. I -- I -- Ruth was not the person who</p> <p>23 identified him to me.</p> <p>24 Q. And so you're not aware that he was</p> <p>25</p> |
| <p style="text-align: right;">Page 71</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 Q. Okay, and was this related to the</p> <p>2 head of the financial services vertical?</p> <p>3 A. That's right. Yes.</p> <p>4 Q. Okay, and so as of March 2nd, 2018</p> <p>5 there was an active search for that position,</p> <p>6 correct?</p> <p>7 A. Yes, whether it was -- yes,</p> <p>8 there -- there was.</p> <p>9 Q. Now, the first Box says "Director of</p> <p>10 Technology and Policy." Do you see that?</p> <p>11 A. I do.</p> <p>12 Q. And that identifies Stuart Breslow;</p> <p>13 correct?</p> <p>14 A. It does, yes.</p> <p>15 Q. At that point in time had he been</p> <p>16 selected as the person to take on that role?</p> <p>17 A. This suggests that he was being</p> <p>18 scheduled with a panel, so he was not yet selected</p> <p>19 as being interviewed.</p> <p>20 Q. What was the director's technology</p> <p>21 and policy role?</p> <p>22 A. It was to help us manage all the</p> <p>23 regulatory and compliance aspects of our Cloud</p> <p>24 business.</p> <p>25</p> | <p style="text-align: right;">Page 73</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 recommended to Google by Ruth Porat?</p> <p>2 A. Within the Google team --</p> <p>3 MR. GAGE: Objection.</p> <p>4 Go ahead.</p> <p>5 Objection, asked and answered.</p> <p>6 Go ahead.</p> <p>7 A. Within the Google recruiting process</p> <p>8 it is routine, once you're about to make an offer,</p> <p>9 to ask former colleagues if you would recommend</p> <p>10 that person.</p> <p>11 I do not know if Ruth was somebody</p> <p>12 they asked to recommend him, but he -- she was not</p> <p>13 the person who recommended him to this search, as</p> <p>14 far as I understand it.</p> <p>15 Q. Were you aware that he had a long</p> <p>16 relationship with her?</p> <p>17 A. I was aware through the interview</p> <p>18 process that he did. Prior to interviewing him, I</p> <p>19 did not, apart from the fact he had been at Morgan</p> <p>20 Stanley in the chief compliance role and she had</p> <p>21 been a longtime leader.</p> <p>22 Q. Okay, I would like you to go back to</p> <p>23 the Box now and look for Exhibit 12.</p> <p>24 MR. GAGE: Tab 12?</p> <p>25</p> |

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86 to 89

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|---|---|
| <p style="text-align: right;">Page 86</p> <p>- TARIQ SHAUKAT -</p> <p>1 it was posted on our -- on our job posting board</p> <p>2 or not.</p> <p>3 Q. And so ultimately did the four</p> <p>4 individuals we discussed earlier, Justin, Evren</p> <p>5 and Ulku, move into your organization?</p> <p>6 A. They did, yes.</p> <p>7 Q. Is this the only situation you're</p> <p>8 aware of where directors at Google moved from one</p> <p>9 group to another group?</p> <p>10 MR. GAGE: Objection.</p> <p>11 A. Could you re -- could you repeat the</p> <p>12 question, please.</p> <p>13 Q. Is this the only situation in which</p> <p>14 you're aware where directors moved from one group</p> <p>15 to another group?</p> <p>16 A. It is not.</p> <p>17 Q. Okay. What other situations are you</p> <p>18 aware of where that's happened?</p> <p>19 A. Honestly, it's a fairly -- if not</p> <p>20 routine, it's not an infrequent occurrence</p> <p>21 within -- within Google.</p> <p>22 Q. And what's the context in which it</p> <p>23 happens, as far as you're aware?</p> <p>24 MR. GAGE: Objection.</p> <p>25</p> | <p style="text-align: right;">Page 88</p> <p>- TARIQ SHAUKAT -</p> <p>1 Q. And what are you aware of with</p> <p>2 respect to that?</p> <p>3 A. You mentioned the term "internal</p> <p>4 mobility." Directors would, as would anyone</p> <p>5 inside of Google, routinely apply for other</p> <p>6 positions and be accepted for those positions and</p> <p>7 change organizations as a result of that.</p> <p>8 Q. And are you aware -- are you familiar</p> <p>9 with the term "Eng" --</p> <p>10 A. Yes.</p> <p>11 Q. -- as it's used at Google?</p> <p>12 And what does that refer to?</p> <p>13 A. Engineering.</p> <p>14 Q. And so with respect to Eng director</p> <p>15 roles, are you familiar with individuals moving</p> <p>16 among Eng director-level roles?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. I am.</p> <p>19 Q. What are you familiar with there?</p> <p>20 A. Very similar to what I mentioned</p> <p>21 earlier, that directors are free to apply for</p> <p>22 other roles and other responsibilities, and</p> <p>23 they -- if they're accepted for those jobs, they</p> <p>24 switch roles.</p> <p>25</p> |
| <p style="text-align: right;">Page 87</p> <p>- TARIQ SHAUKAT -</p> <p>1 A. Change in priorities, change in</p> <p>2 organizational structure, change in the personnel</p> <p>3 who are leading different functions. There's</p> <p>4 range of reasons why this could happen.</p> <p>5 Q. And are those things that are</p> <p>6 different than internal mobility, a director</p> <p>7 choosing to move on their own volition?</p> <p>8 MR. GAGE: Objection.</p> <p>9 A. Correct. These would be</p> <p>10 organizational moves, not individual moves and</p> <p>11 not -- not initiated by them.</p> <p>12 Q. And so are you aware of the</p> <p>13 circumstances where directors have had what you</p> <p>14 refer to as individual moves?</p> <p>15 MR. GAGE: Objection.</p> <p>16 A. I don't understand the question.</p> <p>17 Could you rephrase it, please?</p> <p>18 Q. Sure. I think you referred to</p> <p>19 individual moves as moves being initiated by the</p> <p>20 director as opposed to an organizational move.</p> <p>21 Are you aware of circumstances where a director</p> <p>22 has initiated a move and there has been a move?</p> <p>23 A. Yes.</p> <p>24 MR. GAGE: Objection.</p> <p>25</p> | <p style="text-align: right;">Page 89</p> <p>- TARIQ SHAUKAT -</p> <p>1 Q. Is that something that happens on a</p> <p>2 frequent, infrequent basis; how frequently does it</p> <p>3 happen?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. I would say it's normal course of</p> <p>6 business within Google.</p> <p>7 Q. And with respect to the VP roles that</p> <p>8 you were looking to fill, were you considering</p> <p>9 internal candidates for those roles?</p> <p>10 MR. GAGE: Objection.</p> <p>11 A. I would generally speaking consider</p> <p>12 any internal candidates who would apply, yes.</p> <p>13 Q. And there may be candidates who had</p> <p>14 transferable skills who could move into the role?</p> <p>15 MR. GAGE: Objection.</p> <p>16 A. There certainly could be, yes.</p> <p>17 Q. With respect to the Eng directors,</p> <p>18 were there transferable skills that facilitated</p> <p>19 internal mobility?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. Yes.</p> <p>22 Q. What are those transferable skills?</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. In many ways they are that if you can</p> <p>25</p> |

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90 to 93

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| <p style="text-align: right;">Page 90</p> <p>- TARIQ SHAUKAT -</p> <p>1 develop software for one area, I think the belief</p> <p>2 within Google is you can develop software for</p> <p>3 another area and so you would, in generally</p> <p>4 speaking, be considered for -- for other roles.</p> <p>5 Q. With respect to the three men who</p> <p>6 moved into your organization, did any of them</p> <p>7 leave your organization unit at some point?</p> <p>8 MR. GAGE: Objection.</p> <p>9 A. By "the three men," could you be more</p> <p>10 specific, please?</p> <p>11 Q. Sure. I'm referring to Jeff, Ben,</p> <p>12 and Evren. So with respect to Jeff, Ben and</p> <p>13 Evren, did any of those three subsequently leave</p> <p>14 your organization to go somewhere else within</p> <p>15 Google?</p> <p>16 A. Yes.</p> <p>17 Q. Who?</p> <p>18 A. Evren moved to a product management</p> <p>19 role within Google.</p> <p>20 Q. And when was that?</p> <p>21 A. That would be the summer of 2018.</p> <p>22 Q. I'm sorry, can you just repeat what</p> <p>23 role he went to?</p> <p>24 A. I don't recall the specific role. It</p> <p>25</p> | <p style="text-align: right;">Page 92</p> <p>- TARIQ SHAUKAT -</p> <p>1 mentioned earlier, with Ulku. When the</p> <p>2 announcement was imminent I know that I met her at</p> <p>3 least once, but I don't know the time frame there.</p> <p>4 Just that the announcement would have been</p> <p>5 imminent would mean in the -- in the weeks leading</p> <p>6 up to, but I don't -- I can't be more specific</p> <p>7 than that.</p> <p>8 Q. So with respect to the at least one</p> <p>9 meeting you recall, what do you recall discussing</p> <p>10 with Ms. Rowe? Well, let me -- let me stop.</p> <p>11 Before you answer that question, do</p> <p>12 you recall a conversation separate from the</p> <p>13 conversations you've already discussed with me?</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. Could you be more specific?</p> <p>16 Q. Sure. I think that when we were</p> <p>17 discussing those earlier conversations that you</p> <p>18 had with Ms. Rowe, you -- you phrased it in the</p> <p>19 time frame as before the announcement. Now I'm</p> <p>20 asking: Do you recall any other conversation with</p> <p>21 Ms. Rowe before the time of the announcement, that</p> <p>22 you've not already described to me, with respect</p> <p>23 to her moving to your organization?</p> <p>24 A. As -- as I mentioned when the</p> <p>25</p> |
| <p style="text-align: right;">Page 91</p> <p>- TARIQ SHAUKAT -</p> <p>1 was a product management role, I believe, inside</p> <p>2 of -- inside of Google Cloud.</p> <p>3 Q. So at what point was it</p> <p>4 announced -- with this reorganization moving the</p> <p>5 OCTO folks into your unit, at what point was that</p> <p>6 announced?</p> <p>7 A. I believe -- it was springtime 2018.</p> <p>8 I don't recall the specific date that it was</p> <p>9 announced.</p> <p>10 Q. Did you meet or discuss with Ms. Rowe</p> <p>11 the move before it was announced?</p> <p>12 A. I believe so, yes.</p> <p>13 Q. How -- how much time before it was</p> <p>14 announced did you meet with her; how soon or how</p> <p>15 late before?</p> <p>16 A. I don't have any specific</p> <p>17 recollection of the time frame.</p> <p>18 Q. Do you recall whether it was days or</p> <p>19 weeks or months?</p> <p>20 A. As I mentioned earlier, once we</p> <p>21 started thinking about the transition I made it a</p> <p>22 point to -- to get briefed; and as people</p> <p>23 requested the meetings I would take the meetings</p> <p>24 and so I did have multiple conversations, as I</p> <p>25</p> | <p style="text-align: right;">Page 93</p> <p>- TARIQ SHAUKAT -</p> <p>1 announcement was imminent or once we were -- once</p> <p>2 we had a date in mind and we were starting to work</p> <p>3 towards that date, I do recall meeting with Ulku</p> <p>4 to describe the role and what the structure of the</p> <p>5 vertical team would be.</p> <p>6 Q. And is that a different conversation</p> <p>7 than what you've already described to me?</p> <p>8 A. I believe so, yes.</p> <p>9 Q. Okay, and so how long did that</p> <p>10 conversation last?</p> <p>11 A. Again I don't recall any specifics,</p> <p>12 but it would be -- it would be typical for it to</p> <p>13 have been 30 to 60 minutes.</p> <p>14 Can you please hold on for one</p> <p>15 movement. I apologize.</p> <p>16 Q. Sure.</p> <p>17 (Discussion off the record.)</p> <p>18 A. Would you mind, I -- I have a</p> <p>19 personal situation here, could we take a</p> <p>20 five-minute break, please?</p> <p>21 Q. I'm very happy to take a five-minute</p> <p>22 break.</p> <p>23 A. Take care of my dog -- thank you.</p> <p>24 THE VIDEOGRAPHER: The time is 11:48</p> <p>25</p> |

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94 to 97

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| <p style="text-align: right;">Page 94</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 a.m. and we're going off the record.</p> <p>3 (Whereupon, there was a brief recess</p> <p>4 in the proceedings.)</p> <p>5 THE VIDEOGRAPHER: The time is 11:56</p> <p>6 a.m. and we're back on the record.</p> <p>7 Q. So before we broke, you were telling</p> <p>8 me about a conversation that you had with Ms. Rowe</p> <p>9 regarding her move into the -- into your</p> <p>10 organizational unit and you said it would have</p> <p>11 been somewhere in the 30 to 60- minute range. Do</p> <p>12 you recall whether you were physically present</p> <p>13 together or whether there was some other mode of</p> <p>14 communication?</p> <p>15 A. I don't recall specifically. We</p> <p>16 had -- we were based in different offices so, it</p> <p>17 would not be atypical for it to have been</p> <p>18 videoconference.</p> <p>19 Q. Where were you based?</p> <p>20 A. In Sunnyvale, California.</p> <p>21 Q. Okay, and can you tell me everything</p> <p>22 that you recall being said in that conversation?</p> <p>23 A. I recall walking her through</p> <p>24 basically what the content of the note that I</p> <p>25 subsequently sent out was describing, the</p> | <p style="text-align: right;">Page 96</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 designations that we had and so I walked her</p> <p>3 through that.</p> <p>4 I walked her through what the other</p> <p>5 roles in the industry were going to be; meaning we</p> <p>6 had a product lead, we had an engineering lead, we</p> <p>7 had an industry lead, and dotted-line marketing</p> <p>8 lead, and I think that's it. And so I recall</p> <p>9 us -- me laying that out for her, explaining what</p> <p>10 the role would be, explaining that her role would</p> <p>11 be to come in and do the global client technical</p> <p>12 lead, that this would look and feel and roles and</p> <p>13 responsibilities would be broadly in line with</p> <p>14 what she had been expected to be doing inside of</p> <p>15 OCTO with the possible exception that there would</p> <p>16 be a designated or a -- a specified list of</p> <p>17 clients that she was personally responsible for</p> <p>18 managing.</p> <p>19 That had been the practice that Will</p> <p>20 Grannis and I had with OCTO historically, but I</p> <p>21 don't know in -- in the conversations Ulku</p> <p>22 expressed surprise, surprised that she would be</p> <p>23 restricted to a certain number of accounts, that</p> <p>24 she would be asked to focus on a specific list of</p> <p>25 accounts, which led me to believe that possibly</p> |
| <p style="text-align: right;">Page 95</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 organizational structure that we had in place. So</p> <p>3 I described that we were standing up a group that</p> <p>4 we called the Global Client Lead Group and that</p> <p>5 that team would be focused on the business and</p> <p>6 business development and -- but dedicated to a</p> <p>7 specific list of clients that we called the Global</p> <p>8 Client List; and that we were also setting up a</p> <p>9 team that we called the Global Client Technical</p> <p>10 Lead Team and that that team would be peers of the</p> <p>11 GCLs, as we referred to them Global Client Lead,</p> <p>12 but focused more on the technical aspect. I</p> <p>13 explained that these would be focused on the</p> <p>14 priority list of clients that we would be</p> <p>15 developing. By "we" I mean myself, the sales</p> <p>16 leadership, and Diane would be developing.</p> <p>17 We would assign a list to each of the</p> <p>18 GCLs and the GCTLs, the again Global Client</p> <p>19 Leads and the Global Client Technical Leads, and</p> <p>20 that -- and that those individuals would be</p> <p>21 expected to really be the sponsors and actively</p> <p>22 engaged in what I call the persistent manner in</p> <p>23 those different accounts. So there was a -- a</p> <p>24 discussion about that. Those were both new</p> <p>25 functions or new characterizations and new</p> | <p style="text-align: right;">Page 97</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Will did not manage it in the way that he and I</p> <p>3 had agreed that he would manage the -- the team.</p> <p>4 Q. Do you recall anything she said to</p> <p>5 you that you've not shared so far?</p> <p>6 A. A couple of things. One was the</p> <p>7 surprise, as I mentioned. A lot of clarification</p> <p>8 about why the specifics to specific accounts, what</p> <p>9 account would they be. I told her that they were</p> <p>10 still in -- a work in process, but they would be</p> <p>11 kind of the who's who of the financial services</p> <p>12 world, our top target accounts. So she expressed</p> <p>13 surprise about that.</p> <p>14 She expressed some -- dislike is</p> <p>15 probably the right way to -- to say it, that she</p> <p>16 was not happy with that focus that I was asking</p> <p>17 for on specific global -- on specific accounts and</p> <p>18 the persistent nature of the relationship. She</p> <p>19 was very keen to understand the relationship</p> <p>20 between the global client lead and the global</p> <p>21 client technical lead and -- and the type of</p> <p>22 person we would be hiring into each one of those.</p> <p>23 She was very curious as to whether</p> <p>24 she would be asked to build out a team or not or</p> <p>25 the global client lead and I did explain to her</p> |

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98 to 101

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| <p style="text-align: right;">Page 98</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 that this is -- we are expecting her to come in</p> <p>2 and build a team and lead a team of global client</p> <p>3 leads, but this was what I called the Player Coach</p> <p>4 Role, right, where she would both manage a team,</p> <p>5 but also be expected to have a certain number of</p> <p>6 accounts that she was personally responsible and</p> <p>7 accountable for.</p> <p>8</p> <p>9 Q. And so at the time you had this</p> <p>10 conversation with her, you had already had the</p> <p>11 conversation where HR had shared with you</p> <p>12 background information of her level, correct?</p> <p>13 A. Yes, that would be true.</p> <p>14 Q. Anything else you recall her saying</p> <p>15 to you in this conversation?</p> <p>16 A. Not really except, as I mentioned,</p> <p>17 she expressed her displeasure. I think she said,</p> <p>18 I have go away and think about this and I may have</p> <p>19 more questions. Or at least that's my</p> <p>20 recollection, that she said something to that</p> <p>21 effect.</p> <p>22 Q. Was there any discussion with respect</p> <p>23 to the VP of financial services role in this</p> <p>24 conversation?</p> <p>25 A. Not that I recall.</p> | <p style="text-align: right;">Page 100</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1</p> <p>2 A. I do recall the e-mail, yes.</p> <p>3 Q. And she says in the paragraph -- the</p> <p>4 second paragraph of her e-mail, "As I mentioned,</p> <p>5 the role I'm interested in is VP of Financial</p> <p>6 Services and thank you for the opportunity to be</p> <p>7 considered as a candidate." Do you see that?</p> <p>8 A. I do.</p> <p>9 Q. Do you recall her mentioning that she</p> <p>10 wanted to be considered for the VP of financial</p> <p>11 services?</p> <p>12 A. I do recall her -- her mentioning</p> <p>13 that, yes.</p> <p>14 Q. And was that in the conversation that</p> <p>15 you've just described to me or was that in a</p> <p>16 different conversation or do you not have a</p> <p>17 reaction?</p> <p>18 A. I didn't specifically recall that.</p> <p>19 This e-mail would suggest that it was, but I do</p> <p>20 not specifically recall that.</p> <p>21 Q. Other than a general statement that</p> <p>22 she wanted to be considered for the position, do</p> <p>23 you recall anything else that was said with</p> <p>24 respect to the VP of financial services position?</p> <p>25 A. In -- in the conversation that she</p> |
| <p style="text-align: right;">Page 99</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Not that I recall.</p> <p>4 Q. Okay. I would like you to go back to</p> <p>5 the Box, and you may need to refresh again, and</p> <p>6 we're now going to look at Tab 22.</p> <p>7 A. Sorry, I'm still finding it.</p> <p>8 Tab 22, okay. Got it.</p> <p>9 Q. Okay. We're going to mark this as</p> <p>10 Exhibit 29. This would be Exhibit 29 and it's</p> <p>11 Bates stamped GOOG-ROWE-00017427 through 17428.</p> <p>12 (Whereupon, Plaintiff's Exhibit 29</p> <p>13 was marked at this time.)</p> <p>14 Q. Do you recognize this document, Mr.</p> <p>15 Shaukat?</p> <p>16 A. It appears to be an e-mail exchange</p> <p>17 between me and Will Grannis and several other</p> <p>18 people.</p> <p>19 Q. And if you can go to the second page</p> <p>20 of this document --</p> <p>21 A. Uh-huh.</p> <p>22 Q. -- is this an e-mail between Ms. Rowe</p> <p>23 and yourself?</p> <p>24 A. Yes.</p> <p>25 Q. Do you recall this e-mail?</p> | <p style="text-align: right;">Page 101</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1</p> <p>2 did ask to be considered I told her that I would</p> <p>3 of course, if she wanted to apply for the role,</p> <p>4 consider her as was my normal policy with internal</p> <p>5 people raising their hand for the role and I</p> <p>6 believe I alluded to that in the response here as</p> <p>7 well.</p> <p>8 Q. Okay. Other than that, was there</p> <p>9 anything else you recall being discussed with</p> <p>10 respect to the VP of financial services position?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. In the conversation in which she</p> <p>13 expressed an interest, she asked me what I was</p> <p>14 looking for and I gave her a general description</p> <p>15 of the -- of the -- not financial services</p> <p>16 specific role, but of the industry lead role in</p> <p>17 general using Greg Moore as a reference case</p> <p>18 and -- and that was in the same conversation in</p> <p>19 which she expressed interest in the role -- in</p> <p>20 applying for the role.</p> <p>21 Q. Anything else you recall?</p> <p>22 A. No.</p> <p>23 Q. And at the time, do you recall where</p> <p>24 the financial services search was in terms of the</p> <p>25 process?</p> |

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126 to 129

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| <p style="text-align: right;">Page 126</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 something like that. I'm not sure exactly how I</p> <p>3 said it, but it was basically what do you think we</p> <p>4 should be doing in the industry.</p> <p>5 Q. And just to be clear: You didn't</p> <p>6 tell her that she was interviewing for the VP of</p> <p>7 financial services role in that conversation, did</p> <p>8 you?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. She was not interviewing for the VP</p> <p>11 of financial services role in that conversation.</p> <p>12 Q. Did you in that conversation tell her</p> <p>13 that you were evaluating her for the VP of</p> <p>14 financial services position in that conversation?</p> <p>15 MR. GAGE: Objection.</p> <p>16 A. No, and I don't believe I was</p> <p>17 evaluating her specifically for that. I was</p> <p>18 trying to get to know her.</p> <p>19 Q. Okay, you can close out of that</p> <p>20 document.</p> <p>21 Do you recall whether Ms. Rowe</p> <p>22 contacted you to discuss the VP of financial</p> <p>23 services role?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. I -- I don't recall. As the</p> | <p style="text-align: right;">Page 128</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 p.m. and we're going on the record.</p> <p>3 (Whereupon, a lunch break was taken</p> <p>4 from 12:43 p.m. to 1:17 p.m.)</p> <p>5 VIDEOGRAPHER: The time is 1:17 p.m.</p> <p>6 and we're back on the record.</p> <p>7 Q. Okay. Continuing on: If you go to</p> <p>8 the Box, Mr. Shaukat, and I would like you to look</p> <p>9 at Tab 26.</p> <p>10 A. Okay.</p> <p>11 Q. We're going to mark this as Exhibit</p> <p>12 33. It has the Bates number GOOG-ROWE-00056487</p> <p>13 through 88.</p> <p>14 (Whereupon, Plaintiff's Exhibit 33</p> <p>15 was marked at this time.)</p> <p>16 Q. Do you recognize this document?</p> <p>17 A. It appears to be an e-mail between me</p> <p>18 and Diane Greene.</p> <p>19 Q. From June of 2018, correct?</p> <p>20 A. Correct.</p> <p>21 Q. And I'm going to direct your</p> <p>22 attention to the e-mail with the date and time</p> <p>23 stamp of June 22nd, 2018 at 8:07 a.m. Do you see</p> <p>24 that?</p> <p>25 A. Yup.</p> |
| <p style="text-align: right;">Page 127</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 discussion -- as the note that we just saw</p> <p>3 indicates, it was part of the conversation we had</p> <p>4 about the move which would be a meeting that I</p> <p>5 scheduled, not that she scheduled, but I don't</p> <p>6 know that I -- I have no understanding beyond what</p> <p>7 we see in the e-mails.</p> <p>8 MS. GREENE: I just looked up at the</p> <p>9 time and it's 12:45 Eastern Time. It occurs</p> <p>10 to me this might be a good time for a short</p> <p>11 lunch break particularly, you know, for Hope</p> <p>12 and our videographer. How long did you need,</p> <p>13 Mr. Shaukat, yourself; 30 minutes 45, which</p> <p>14 is your preference?</p> <p>15 THE WITNESS: I'm good with a very</p> <p>16 short break of 15 minutes or -- whatever is</p> <p>17 suitable for everyone else here, but I don't</p> <p>18 need that much time. I don't need much time.</p> <p>19 MS. GREENE: Well, out of courtesy to</p> <p>20 those whose hands have been typing, I like to</p> <p>21 at least give them a 30-minute break, if not</p> <p>22 longer.</p> <p>23 MR. GAGE: I think we could probably</p> <p>24 go off the record for this.</p> <p>25 THE VIDEOGRAPHER: The time is 12:43</p> | <p style="text-align: right;">Page 129</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. And do you see the paragraph that</p> <p>3 says, "Ulku from OCTO is also very interested. I</p> <p>4 don't think she's likely right, but I told her I</p> <p>5 would formally interview her for the role." Do</p> <p>6 you see that?</p> <p>7 A. I do.</p> <p>8 Q. Does that fairly reflect your view as</p> <p>9 of June 22nd, 2018?</p> <p>10 A. I believe so. I wouldn't have</p> <p>11 written it otherwise I guess. I have no reason to</p> <p>12 believe it doesn't. Oh, sorry, I said I have no</p> <p>13 reason to believe it doesn't. Again, I wouldn't</p> <p>14 have told Diane otherwise.</p> <p>15 Q. Okay. I want you to go back to the</p> <p>16 Box. You can close that document out.</p> <p>17 A. Okay.</p> <p>18 Q. And look at Tab 32.</p> <p>19 A. Tab 32, I have it open.</p> <p>20 Q. We're going to mark this as Exhibit</p> <p>21 34 with the Bates stamp GOOG-ROWE-00017499 through</p> <p>22 17501.</p> <p>23 (Whereupon, Plaintiff's Exhibit 34</p> <p>24 was marked at this time.)</p> <p>25 Q. Do you recognize this document?</p> |

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| <p style="text-align: right;">Page 142</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. So who were the other qualified VP</p> <p>3 women who could have served on this interview</p> <p>4 panel?</p> <p>5 A. So now we're -- I have -- I have to</p> <p>6 recall who was at what level back in those days,</p> <p>7 so I'm -- so this one is going to be a little bit</p> <p>8 hard.</p> <p>9 There was Olivia who I mentioned in</p> <p>10 the go-to-market organization. There was Carolee</p> <p>11 Gearhart who I can't recall if Carolee joined at</p> <p>12 this time or later, but I often asked her to do</p> <p>13 interviews as well on some of my interview panels</p> <p>14 at the VP level. So from the go-to-market</p> <p>15 organization, those would be the two women that we</p> <p>16 would typically -- that I would tap into as the</p> <p>17 two senior VPs in the go-to market or the customer</p> <p>18 organization, as I referred to it earlier.</p> <p>19 In -- in my team, VPs in general were</p> <p>20 in short supply. I only had the one at the time</p> <p>21 which was Greg Moore and so my team did not have</p> <p>22 any VP at that point, male or female, apart from</p> <p>23 Greg Moore; and Darryl Willis joined as the VP of</p> <p>24 Energy at this time as -- as well, but that --</p> <p>25 that was a fairly small pool in my org; and on</p> | <p style="text-align: right;">Page 144</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 honestly was the best read of leadership and</p> <p>3 culture fit that I've seen in my team at Google;</p> <p>4 so I -- I normally would ask her to carve out a</p> <p>5 time for this.</p> <p>6 Again, this was one of many and so</p> <p>7 I'm not 100 percent sure that she was asked here,</p> <p>8 but it would not have been atypical for me to have</p> <p>9 asked her for a role like this.</p> <p>10 Q. Are you aware that Ms. Rowe was</p> <p>11 interviewed in connection with the head of</p> <p>12 financial services role?</p> <p>13 A. As part of -- of the weekly updates I</p> <p>14 would get from Stuart, I would be apprised on the</p> <p>15 status of all the candidates including Ulku, yes.</p> <p>16 Q. And do you know who interviewed her?</p> <p>17 A. Again, I remember Sebastien --</p> <p>18 reading Sebastien's feedback. I remember reading</p> <p>19 Jason Martin's feedback. I believe that Brian</p> <p>20 Stevens recused himself from her interview given</p> <p>21 his earlier statement that he thought that she was</p> <p>22 a good candidate for the role, but I don't know</p> <p>23 that for a fact. It's just sort of a vague</p> <p>24 recollection that I have at this point. So I</p> <p>25 remember Sebastien and I remember Jason. I don't</p> |
| <p style="text-align: right;">Page 143</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 occasion Suzanne Frey who was a VP in the</p> <p>3 engineering org would do a lot of interviews for</p> <p>4 me, but I believe she was promoted to VP in</p> <p>5 November of that year, if I'm recalling correctly.</p> <p>6 So there -- there were other people</p> <p>7 besides Olivia, but they -- candidly at the VP</p> <p>8 level who had the expertise that we needed. It</p> <p>9 wasn't as large a pool as I would have liked.</p> <p>10 Q. And you can't recall if you asked</p> <p>11 Olivia to serve on this panel, is that your</p> <p>12 testimony?</p> <p>13 A. I generally asked Olivia to serve on</p> <p>14 many of my panels. Whether this one in</p> <p>15 particular, this was one of -- I had literally</p> <p>16 dozens of searches that I did, so I don't recall</p> <p>17 if I asked her on this one or not; and Becky</p> <p>18 Bucich was another VP inside of Google Cloud that</p> <p>19 we did -- that I did ask quite a lot and I believe</p> <p>20 she was on the interview panel here as -- as well.</p> <p>21 Q. You believe she was on the interview</p> <p>22 panel for the head of financial services?</p> <p>23 A. I believe so. She was typically for</p> <p>24 the industry lead roles, but -- because we were</p> <p>25 looking for leadership in culture fit and Becky</p> | <p style="text-align: right;">Page 145</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 remember the others.</p> <p>3 Q. So you recall Jason giving you</p> <p>4 written feedback?</p> <p>5 A. I remember Jason providing feedback</p> <p>6 at a minimum through Stuart. I don't actually</p> <p>7 know, it -- it wasn't my practice, as I mentioned</p> <p>8 earlier, in going to Ghire and read the feedback.</p> <p>9 I would more hear the feedback from the weekly</p> <p>10 updates I had with the -- excuse me, with the</p> <p>11 recruiting team.</p> <p>12 Q. And so if Jason did give feedback, it</p> <p>13 would be reflected in Ghire?</p> <p>14 A. I -- as I mentioned earlier, I think</p> <p>15 compliance was reflecting feedback in Ghire.</p> <p>16 I -- I can't speak to what the rates are, but</p> <p>17 I -- I'm not certain. I have no way of validating</p> <p>18 that people did do that or not, I guess.</p> <p>19 Q. Well, if Stuart had gotten feedback</p> <p>20 from Jason, would it be reflected somewhere?</p> <p>21 A. If Stuart Vardaman had gotten</p> <p>22 feedback from Jason, I would assume it would be</p> <p>23 been in Stuart's notes. I don't know what his</p> <p>24 note-taking capabilities are and I don't know</p> <p>25 if -- if Stuart entered it into Ghire or kept it</p> |

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| <p style="text-align: right;">Page 146</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 in a Google Doc or other some other form. I</p> <p>3 just -- I don't know what his practice was. I</p> <p>4 know what he showed me, which was -- and the</p> <p>5 discussion that we had.</p> <p>6 Q. Particularly with respect to Jason?</p> <p>7 A. No, in -- in general.</p> <p>8 Q. Okay. What do you recall Stuart</p> <p>9 telling you about feedback he had gotten from</p> <p>10 Jason?</p> <p>11 A. I don't --</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. Sorry.</p> <p>14 MR. GAGE: I said objection.</p> <p>15 A. I don't recall this -- I -- I recall</p> <p>16 the general feedback between Sebastien and Jason.</p> <p>17 I don't recall specially what came from Jason and</p> <p>18 what came from Sebastien. The general feedback</p> <p>19 was that they had a hard time understanding and</p> <p>20 getting Ulku to articulate a vision for the</p> <p>21 financial services industry, to articulate the</p> <p>22 business needs that she felt the industry was</p> <p>23 facing that Google Cloud could help with, and</p> <p>24 they -- they were unclear whether she would be</p> <p>25 able to lay out or she didn't demonstrate I guess</p> | <p style="text-align: right;">Page 148</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 they should, but it would be a discussion with</p> <p>3 Stuart about status, general feedback, any</p> <p>4 specific concerns, next step; and that's sort of a</p> <p>5 routine we did week for every role that we got.</p> <p>6 And in my case I actually insisted on</p> <p>7 doing it for what I considered the leadership</p> <p>8 roles in my team that -- even if they didn't</p> <p>9 report to me, just so I understood what my team</p> <p>10 was doing. So leadership roles would either be</p> <p>11 roles that -- typically they would be roles that</p> <p>12 report directly to people who report to me.</p> <p>13 Sometimes those would be directors, sometimes they</p> <p>14 would be manager-level folks.</p> <p>15 In addition to that, you know, I</p> <p>16 worked with Jason, Sebastien, Brian on a daily</p> <p>17 basis and it would not be atypical for them to</p> <p>18 have say oh, by the way, I interviewed so-and-so,</p> <p>19 here's what I thought, I'm going to give the</p> <p>20 feedback to Stuart, there's no reason to keep it</p> <p>21 from him; and, in fact, when they had an</p> <p>22 opportunity for a conversation they would often</p> <p>23 volunteer that.</p> <p>24 I don't have any specific</p> <p>25 recollection of them doing with Ulku. As I</p> |
| <p style="text-align: right;">Page 147</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 that she would be able to lay out a product</p> <p>3 mandate, for lack a better word, for the vertical.</p> <p>4 And so that was the consistent</p> <p>5 impression that I got from the interviews with</p> <p>6 Sebastien and Jason, but I don't remember</p> <p>7 specifically what each one of them said and I'm</p> <p>8 not sure I was ever told specifically what each</p> <p>9 one of them said.</p> <p>10 Q. So if you -- let's break this down.</p> <p>11 Who did you have conversations with regarding how</p> <p>12 Ms. Rowe's interviews went?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. So I had a standing weekly meeting</p> <p>15 with the leadership staffing team led by Stuart</p> <p>16 Vardaman. In that standing weekly meeting, Stuart</p> <p>17 would update me on the status of each of the</p> <p>18 candidates in the pipeline. He would do that by</p> <p>19 providing at least a verbal -- in some cases</p> <p>20 bullet pointed, but in some cases a verbal summary</p> <p>21 of the feedback that was provided from the</p> <p>22 interviewers; and in some cases -- in many cases</p> <p>23 he would say, I need your help chasing feedback</p> <p>24 because I haven't gotten it yet. People get busy</p> <p>25 and they don't necessarily send the e-mails that</p> | <p style="text-align: right;">Page 149</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 mentioned, she was one of many industry leads and</p> <p>3 senior hires we were trying to hire at the time</p> <p>4 or she was interviewing for one of the roles that</p> <p>5 we were -- in one of the many roles that we were</p> <p>6 interviewing for at the time. So I don't -- it --</p> <p>7 it would not have been unlikely. I can't tell you</p> <p>8 I didn't have a direct conversation with them, but</p> <p>9 I don't have a specific recollection of them</p> <p>10 sending me a Hangout message or a verbal</p> <p>11 conversation or anything like that.</p> <p>12 Jason's office and my office during</p> <p>13 this time were across the hall from each other, as</p> <p>14 an example, so we had casual conversations about</p> <p>15 business in my office or in his office quite</p> <p>16 frequently.</p> <p>17 Q. Okay. Do you recall specifically</p> <p>18 having a conversation with Stuart Vardaman</p> <p>19 regarding the feedback from the interviews with</p> <p>20 Ms. Rowe?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. As I just mentioned, I recall</p> <p>23 having -- I rec -- I recall in the standing</p> <p>24 meeting having Stuart tell me the feedback that</p> <p>25 had come through the initial round of interview</p> |

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| <p style="text-align: right;">Page 150</p> <p>- TARIQ SHAUKAT -</p> <p>1 candidates, yes, and -- and including Ulku,</p> <p>2 specific to Ulku, yes.</p> <p>3 Q. And what do you recall him saying to</p> <p>4 you specifically with respect to Ms. Rowe?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. So, as I -- as I just mentioned, he</p> <p>7 said that the -- the interviews had happened. He</p> <p>8 said that generally speaking people feel quite</p> <p>9 comfortable with her technical capability, but</p> <p>10 there were concerns around what I'll term</p> <p>11 broadly as the -- as the business aspects of that;</p> <p>12 meaning specifically her ability to articulate</p> <p>13 a prop -- a vision for the industry, articulate</p> <p>14 a value proposition for Google Cloud in the</p> <p>15 industry that would be differentiated versus other</p> <p>16 potential offerings in the industry that would be</p> <p>17 translatable to a product level, which was really</p> <p>18 one of the core things that we were solving for</p> <p>19 was who could help us figure out what products to</p> <p>20 build and how to position those in the market.</p> <p>21 They did not see evidence, or they did not believe</p> <p>22 I should say, coming out of the discussion that</p> <p>23 Ulku demonstrated that she had the prod -- the</p> <p>24 product vision or the ability to develop a product</p> <p>25</p> | <p style="text-align: right;">Page 152</p> <p>- TARIQ SHAUKAT -</p> <p>1 her? Did he share with you that Vat liked her?</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Honestly, I didn't remember that Vat</p> <p>4 had interviewed her so I don't recall whether he</p> <p>5 shared that Vat liked her or not. He's not</p> <p>6 someone I recall being on the interview panel.</p> <p>7 Q. Did he share with you that Darryl</p> <p>8 liked her?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. Again I did not recall that Darryl</p> <p>11 was on the interview panel, so I don't recall him</p> <p>12 saying that.</p> <p>13 Q. Okay. So you had a conversation with</p> <p>14 Stuart. Who else do you specifically recall</p> <p>15 having a conversation with regarding Ms. Rowe's</p> <p>16 interview?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. I don't have a specific -- I don't</p> <p>19 recall having a specific conversation with anybody</p> <p>20 else, that I can remember.</p> <p>21 Q. And by conversations I'm including a</p> <p>22 conversation, a Google Hangout, a videoconference,</p> <p>23 anything other than just an e-mail communication;</p> <p>24 does that change your answer?</p> <p>25</p> |
| <p style="text-align: right;">Page 151</p> <p>- TARIQ SHAUKAT -</p> <p>1 vision for the industry.</p> <p>2 So there was no negative feedback.</p> <p>3 There was only positive feedback on the technical</p> <p>4 side and there were questions and concerns on the</p> <p>5 nontechnical side, and I'll include product</p> <p>6 management as the nontechnical in -- in that</p> <p>7 description.</p> <p>8 Q. Did Mr. Vardaman share with you from</p> <p>9 where the feedback was coming, how he gathered</p> <p>10 this feedback?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. I don't -- Stuart's normal expression</p> <p>13 was I'm chasing everybody and here's what I got,</p> <p>14 but I don't know in this case how he got the</p> <p>15 feedback. I don't know what that would have</p> <p>16 translated into in this case.</p> <p>17 Q. When did he share that feedback with</p> <p>18 you?</p> <p>19 A. I -- it would have been the week or</p> <p>20 two depending on when we met after that round of</p> <p>21 interviews with Ulku, but I don't know even</p> <p>22 roughly when that was. Yeah -- yeah, I don't know</p> <p>23 when that was.</p> <p>24 Q. Did he share with you that Vat liked</p> <p>25</p> | <p style="text-align: right;">Page 153</p> <p>- TARIQ SHAUKAT -</p> <p>1 A. It doesn't. I'm just trying to</p> <p>2 remember. I have a very vague recollection of</p> <p>3 telling Brian that several of the interviews</p> <p>4 didn't go well, that there were some concerns</p> <p>5 raised, but I can't -- but it's a very faint</p> <p>6 recollection and I don't know, I -- I can't recall</p> <p>7 anymore details about that conversation, but</p> <p>8 that's the only one that's even vaguely coming to</p> <p>9 mind.</p> <p>10 Q. Give me just a moment.</p> <p>11 Okay, I would like you to look in the</p> <p>12 Box again and we're going to be looking at Tab 38.</p> <p>13 We're going to mark it as Exhibit 35 and it has</p> <p>14 the Bates stamp number GOOG-ROWE-00017533 through</p> <p>15 38.</p> <p>16 (Whereupon, Plaintiff's Exhibit 35</p> <p>17 was marked at this time.)</p> <p>18 Q. Do you recognize this document?</p> <p>19 A. It appears to be an e-mail from me to</p> <p>20 Sebastien Marotte.</p> <p>21 Q. And is this the same Sebastien that</p> <p>22 we have been discussing?</p> <p>23 A. It is, yes.</p> <p>24 Q. And do you see on Wednesday, August</p> <p>25</p> |

Tariq Shaukat
10/15/2020

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| <p style="text-align: right;">Page 158</p> <p>- TARIQ SHAUKAT -</p> <p>Normally I would be the gatekeeper before it goes to panel and in this case we were skipping the gatekeeper.</p> <p>So I did have that conversation quite explicitly with Stuart and that again, would not be atypical for somebody who I had had some experience with who would be an internal candidate, but anything more detailed than that I don't believe I had a conversation with him about.</p> <p>Q. And in wanting to be late to the interview process in that -- in this case, does that mean that you ended up not interviewing her at all for the position?</p> <p>A. I don't believe I interviewed her for the position so, yes, that would be correct.</p> <p>Q. Now, I would like you to take look at Tab 44.</p> <p>A. Okay.</p> <p>Q. And we are going to mark this as Exhibit 37 and it has the Bates number GOOG-ROWE --</p> <p>MS. GREENE: Oh, you know what actually, can you take that down for a moment?</p> | <p style="text-align: right;">Page 160</p> <p>- TARIQ SHAUKAT -</p> <p>MS. GREENE: Sure. Sure, and I apologize, I just hasn't processed that one was AEO and the others were just Confidential.</p> <p>Ms. Gelfand, can you please put it back into the share drive and then (unintelligible crosstalk) Mr. Gage can review it.</p> <p>MS. GELFAND: Yeah, it should be back up.</p> <p>MR. GAGE: Sure, let me refresh. That's fine.</p> <p>MS. GREENE: Okay, thank you.</p> <p>MR. GAGE: We -- we have no objection.</p> <p>MS. GREENE: Okay.</p> <p>Q. Now, Mr. Shaukat if you could open that Tab 44 and we're marking it as Exhibit 37, and again the Bates number is GOOG-ROWE-00017565.R through 66.</p> <p>(Whereupon, Plaintiff's Exhibit 37 was marked at this time.)</p> <p>Q. Do you recognize this document?</p> <p>A. It appears to be an e-mail from</p> |
| <p style="text-align: right;">Page 159</p> <p>- TARIQ SHAUKAT -</p> <p>MS. GELFAND: Sure.</p> <p>Q. And can you close out of this for a moment, Mr. Shaukat.</p> <p>A. I have closed it.</p> <p>MS. GREENE: Mr. Gage, I -- I just noticed that this document is marked "Attorneys Eyes Only." I'm not sure if that was a correct designation. I would note that he is a recipient of this e-mail. I want to -- before he reviews it to see if you have any objection to us showing this to him in the course of this deposition. If you do, I'm -- I'm happy to not show it to him or if you need more time to review it, I'm fine with delaying this.</p> <p>MR. GAGE: I -- I probably have no problem, but I would like to look at it and it's no longer there so I can't look at it so...</p> <p>MS. GREENE: You know what we'll do --</p> <p>MR. GAGE: Why don't you put it back up and ask the witness not to open it. I'll take a quick look and --</p> | <p style="text-align: right;">Page 161</p> <p>- TARIQ SHAUKAT -</p> <p>Stuart Vardaman to me on September 1st, 2018.</p> <p>Q. Okay, and if you can look at the bullet, particularly the one bullet "FSI," do you see that?</p> <p>A. I do.</p> <p>Q. And it says; "Ulku has been in the ether for a bit. It doesn't sound like she is viable for -- Ulku -- "Ulku has been in the ether for a bit. It doesn't sound like she is viable for the VP role. Do we position her as the Global Client Technical Director L 8?" Do you see that?</p> <p>A. I do.</p> <p>Q. Is that -- was that your view as to Ms. Rowe's candidacy in September of 2018, that she was not viable for the VP role?</p> <p>A. I don't recall if it was my view. I -- it would depend on when the feedback from Sebastien and Jason came in, but once we received the negative feedback from those interviews on the business dimensions, then we started suspecting that she was not going to end up being the finalist for the role.</p> <p>Q. So as of September of 2018, was it your view or did you have a view as to whether she</p> |

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| <p style="text-align: right;">Page 162</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 was viable for the role?</p> <p>3 MR. GAGE: Objection, asked and</p> <p>4 answered.</p> <p>5 A. I -- again, I don't know the specific</p> <p>6 timing what my view was. I know that it would be</p> <p>7 after I received the feedback from Jason and</p> <p>8 Sebastien, but I don't know that feedback in</p> <p>9 relation to September 1st, 2018.</p> <p>10 Q. What do you recall with respect to</p> <p>11 Ms. Rowe interviewing with Diane Greene?</p> <p>12 A. Once we decided that Ulku was not</p> <p>13 going to be a finalist because of the interview</p> <p>14 feedback that we had received, I moved into</p> <p>15 retention mode because I did value Ulku and did</p> <p>16 want her to join the team and to make the</p> <p>17 transition that we had been trying to enact work;</p> <p>18 and I thought that having a courtesy meeting with</p> <p>19 Diane would be helpful in -- in assisting us in</p> <p>20 retaining Ulku.</p> <p>21 I suspected, and Ulku said at the</p> <p>22 time, that if she didn't get the -- the FSI Lead</p> <p>23 role that she would leave Google which is not an</p> <p>24 outcome that I wanted to see because, as the</p> <p>25 interviews noted, she was quite strong on the</p> | <p style="text-align: right;">Page 164</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 time she had been recruited into Google, it was</p> <p>3 with the expectation that she would get this role</p> <p>4 once financial services verticalized?</p> <p>5 A. She asserted to me that that had been</p> <p>6 told to her, yes.</p> <p>7 Q. When did she assert that to you?</p> <p>8 A. When she threw her hat in the ring in</p> <p>9 the very beginning, so that would be I guess in</p> <p>10 June, 2018 and possibly subsequent to that as</p> <p>11 well. I believe I had a conversation -- or not I</p> <p>12 believe. I know I had a conversation with her in</p> <p>13 December, 2018 in which I did finally close out</p> <p>14 the role and I believe she reiterated then that</p> <p>15 she believed she had been promised the role.</p> <p>16 Q. At the time she asserted that, did</p> <p>17 she say who had promised her the role?</p> <p>18 A. She said Will Grannis had -- had led</p> <p>19 her to believe, I believe was the expression, that</p> <p>20 that was the case. I asked for more detail. She</p> <p>21 didn't provide me with any more detail as a part</p> <p>22 of that.</p> <p>23 Q. Did you talk to Will about that?</p> <p>24 A. I raised it to Will and Brian and</p> <p>25 said was this in fact the case and they both</p> |
| <p style="text-align: right;">Page 163</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 technical side of things. So the -- the Diane</p> <p>3 meeting was meant to be part of an -- an attempt</p> <p>4 to make her comfortable and happy with the role</p> <p>5 that we did think she was a very good fit for.</p> <p>6 Q. Did you tell her it was an interview</p> <p>7 in connection with the VP of financial services</p> <p>8 role?</p> <p>9 A. The "her" in this case would be who?</p> <p>10 Q. Ulku.</p> <p>11 A. I don't know if I actually told Ulku</p> <p>12 anything, except that we would schedule a meeting</p> <p>13 with Diane. I'm not sure what -- what Stuart said</p> <p>14 to her about it, but -- and it's certainly the</p> <p>15 case that we did not close Ulku out at this point</p> <p>16 and tell her that we didn't think she was a</p> <p>17 finalist candidate in part. Because Brian did</p> <p>18 feel so strongly about it, I wanted her to meet</p> <p>19 Diane as I mentioned from a -- from a retention</p> <p>20 standpoint, but if Diane thought we had the wrong</p> <p>21 read on it that we might go back and take a look.</p> <p>22 So we definitely did not tell Ulku that she was</p> <p>23 not getting through to the next round as part of</p> <p>24 setting up the meeting with Diane.</p> <p>25 Q. Did Ulku tell you that she -- at the</p> | <p style="text-align: right;">Page 165</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 denied that being the case.</p> <p>3 Q. When did you raise it with Will and</p> <p>4 Brian?</p> <p>5 A. It likely was right after. I</p> <p>6 don't -- I remember the conversation. I don't</p> <p>7 remember when it was, but it would have been -- I</p> <p>8 was fairly surprised at the assertion and so it</p> <p>9 would have been probably right afterwards or</p> <p>10 whenever I could reach them right afterwards.</p> <p>11 Q. So this is a conversation that you've</p> <p>12 not previously talked about that you're now</p> <p>13 remembering --</p> <p>14 MR. GAGE: Objection.</p> <p>15 Q. -- is that right?</p> <p>16 MR. GAGE: Objection. You haven't</p> <p>17 asked him about this conversation.</p> <p>18 A. I did not recall this being part of</p> <p>19 the conversation when Ulku threw her hat in the</p> <p>20 ring until you referenced it and then it did spark</p> <p>21 the recollection.</p> <p>22 Q. Okay, and with respect to the</p> <p>23 conversations with Will and Brian that you're now</p> <p>24 testifying about, you've not previously testified</p> <p>25 about these conversations, correct?</p> |

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| <p style="text-align: right;">Page 202</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 p.m. and we're back on the record.</p> <p>3 Q. Mr. Shaukat, were -- the position</p> <p>4 that Ms. Rowe was brought in to into your</p> <p>5 organization, that was -- was that the global</p> <p>6 client lead role?</p> <p>7 A. I'm sorry, that she was brought into</p> <p>8 my organization or into the organization?</p> <p>9 Q. Into your -- into your organization.</p> <p>10 What was -- what was the role that she was brought</p> <p>11 into your organization?</p> <p>12 A. I think the official title we gave it</p> <p>13 was technical director of the global client team</p> <p>14 or the financial services vertical.</p> <p>15 Q. And was an informal term the -- the</p> <p>16 global client lead?</p> <p>17 A. No, it was global client technical</p> <p>18 lead. It's a slightly -- it a more technical</p> <p>19 version versus the business version.</p> <p>20 Q. Okay. So there was a global</p> <p>21 cli -- client technical lead and the global</p> <p>22 what -- what was the other --</p> <p>23 A. Sorry. There's a global client lead</p> <p>24 which was not Ulku and then there's a global</p> <p>25 client technical lead which was Ulku.</p> | <p style="text-align: right;">Page 204</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 technical lead team underneath him.</p> <p>3 Within the manufacturing vertical</p> <p>4 we brought two individuals over or into the</p> <p>5 organization, I should say. One of them named was</p> <p>6 Kanai, which is K-A-N-A -- A-I I believe and the</p> <p>7 other is Carlos. I don't recall their last names,</p> <p>8 but they came over as part of the global client</p> <p>9 technical lead structure and organization.</p> <p>10 Q. Any other global client technical</p> <p>11 leads in your organization that you recall?</p> <p>12 A. Not that I recall, no.</p> <p>13 Q. What about with respect to the global</p> <p>14 client leads, who -- who held the positions of</p> <p>15 global client leads while you were heading up the</p> <p>16 reorganization?</p> <p>17 A. So we had a number of people there as</p> <p>18 well. In the media industry we had Anil Jain who</p> <p>19 was the global client lead director, the Director</p> <p>20 of Global Client I think we called it, meaning he</p> <p>21 oversaw the entire team for the media industry.</p> <p>22 We had Caleb Weinstein who was in the team as</p> <p>23 well. Both of them were hired subsequent I</p> <p>24 believe to this reorganization that I talked</p> <p>25 about.</p> |
| <p style="text-align: right;">Page 203</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. Okay. Were there other people in the</p> <p>3 global client technical lead role?</p> <p>4 A. All of the people brought over from</p> <p>5 OCTO into my team joined in that role. So the</p> <p>6 folks I mentioned earlier, Ben Wilson, Jeff Kember</p> <p>7 and Evren, all came over in that global client</p> <p>8 technical lead role.</p> <p>9 Q. And were there any individuals apart</p> <p>10 from those four in the global client technical</p> <p>11 lead role?</p> <p>12 A. At the time at which we moved them</p> <p>13 over that was a new role and new structure we</p> <p>14 created given the reorganization we were doing, so</p> <p>15 there was no one else I remember in those roles.</p> <p>16 We subsequently hired some people</p> <p>17 into those roles, but at the time they came over</p> <p>18 they were newly-created roles.</p> <p>19 Q. And who did you subsequently hire</p> <p>20 into those roles?</p> <p>21 A. Let me think. So Jeff Kember, as an</p> <p>22 example, built out his team. I'm honestly</p> <p>23 blanking or forgetting the names of the</p> <p>24 individuals that he brought on to his team, but he</p> <p>25 brought several people for the media industry</p> | <p style="text-align: right;">Page 205</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. And -- I'm sorry.</p> <p>3 A. In the financial -- sorry, in the</p> <p>4 healthcare world we had Paul Torrey, Amy Waldron,</p> <p>5 and Shweta Maniar. That was S-H-W-E-T-A,</p> <p>6 M-A-N-I-A-R I believe was how she spelled her</p> <p>7 name. So we had Paul, Amy and Shweta there as</p> <p>8 global client leads for healthcare.</p> <p>9 For manufacturing and automotive, we</p> <p>10 had Dominick We who came in to lead that team,</p> <p>11 and we -- let me think.</p> <p>12 Then in financial services -- I can't</p> <p>13 recall exactly what the role was that Tais</p> <p>14 O'Dwyer was brought in at. I -- my recollection</p> <p>15 is she was brought in as a global client lead,</p> <p>16 but I don't know that for certain. I -- that's my</p> <p>17 best recollection at the moment.</p> <p>18 And then we had a couple for what we</p> <p>19 called our Marketing Vertical, whose names are</p> <p>20 escaping me at the moment.</p> <p>21 Q. Okay. I would like you to look at</p> <p>22 Tab 62.</p> <p>23 A. I don't believe it's up yet.</p> <p>24 MR. GAGE: It's not showing up here</p> <p>25 at my end either.</p> |

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| <p style="text-align: right;">Page 238</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 you.</p> <p>2 Q. Okay, and if you look at your e-mail</p> <p>3 on the next page, 906 at 11:02 a.m. on March 30th,</p> <p>4 you're discussing the staffing for the meeting; is</p> <p>5 that correct?</p> <p>6 A. The e-mail at 11:02, is that what</p> <p>7 you're referring to?</p> <p>8 Q. Yes.</p> <p>9 A. We were -- not so much the staffing</p> <p>10 for the meeting, but the executive sponsor</p> <p>11 assignment for the meeting.</p> <p>12 Q. Okay. Now, does that refresh your</p> <p>13 recollection at all in terms of how this meeting</p> <p>14 is being noticed with (inaudible).</p> <p>15 MR. GAGE: Objection. Oh, apologies.</p> <p>16 MS. GREENE: I'll repeat the</p> <p>17 question.</p> <p>18 Q. Does this refresh your recollection</p> <p>19 with respect to how much advanced notice was</p> <p>20 provided with respect to the BlackRock Aladdin</p> <p>21 meeting?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. I mean, this would indicate that it</p> <p>24 was about a week's notice. I'm not sure it</p> <p>25</p> | <p style="text-align: right;">Page 240</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 charge of that while we figured out what the</p> <p>2 long-term strategy and structure was going to be.</p> <p>3 All of that said, that would have</p> <p>4 been in I believe the November, 2018 time frame.</p> <p>5 I don't recall exactly when in November it was.</p> <p>6 It may have been late -- late October, but it was</p> <p>7 in roughly that time frame.</p> <p>8 Q. Okay, and the interim role that you</p> <p>9 referenced, that's the head of financial services,</p> <p>10 correct?</p> <p>11 A. Yes, but I would just emphasize it</p> <p>12 was not the job description that we were referring</p> <p>13 to earlier. It was a caretaker role for the</p> <p>14 existing team while we figured out what the future</p> <p>15 scope was going to be for the vertical and for the</p> <p>16 role.</p> <p>17 Q. Was that before or after it was</p> <p>18 communicated to Ms. Rowe that she would not be</p> <p>19 receiving the head of financial services position</p> <p>20 that you had -- that you made that decision?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. Can you repeat the question, please?</p> <p>23 Q. Sure. The decision to put Stuart</p> <p>24 Breslow in that role, did you make the decision</p> <p>25</p> |
| <p style="text-align: right;">Page 239</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 refreshes my recollection so I'm not sure I ever</p> <p>2 internalized that, but it does suggest that it was</p> <p>3 a week's notice.</p> <p>4 Q. Okay. You can put that aside.</p> <p>5 MR. GAGE: I'm sorry, did you say</p> <p>6 something, Cara?</p> <p>7 MS. GREENE: I said you can put that</p> <p>8 aside.</p> <p>9 MR. GAGE: Okay, I didn't hear.</p> <p>10 Q. When did you decide that Stuart</p> <p>11 Breslow would take over the head of financial</p> <p>12 services role?</p> <p>13 A. Well, to -- to be precise, I don't</p> <p>14 agree that I decided that he would take over the</p> <p>15 head of financial services role. I asked him to</p> <p>16 play an interim role while we figured out what the</p> <p>17 strategy of the financial services industry</p> <p>18 would be, given some of the leadership changes</p> <p>19 which -- which is quite different. We put</p> <p>20 as -- as a earlier e-mail indicated, we had put</p> <p>21 the strat -- the vertical strategy essentially on</p> <p>22 pause when Thomas Kurian came in pending his</p> <p>23 blessing, for lack of a better word. So -- so I</p> <p>24 very specifically asked Stuart to be interim in</p> <p>25</p> | <p style="text-align: right;">Page 241</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 before or after you communicated to Ms. Rowe that</p> <p>2 she would not be getting the financial services</p> <p>3 vertical lead role?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. That would be before, as I believe</p> <p>6 the e-mail previously indicated. Meaning I had</p> <p>7 decided that Stuart would be the interim lead</p> <p>8 before I told Ulku that we were shutting down that</p> <p>9 search and if we reopened it that she would not be</p> <p>10 a candidate for it in -- in the future.</p> <p>11 Q. Did you consider Ms. Rowe for the</p> <p>12 interim position?</p> <p>13 A. I -- I did consider Ulku as a</p> <p>14 potential option for the interim role.</p> <p>15 Q. When did you consider her as a</p> <p>16 potential option?</p> <p>17 A. Roughly in the same time frame as I</p> <p>18 was -- as I indicated earlier, of making the</p> <p>19 decision on -- on Stuart doing that role.</p> <p>20 Q. Was there anyone else you considered</p> <p>21 as a possibility for the interim role?</p> <p>22 A. I don't believe so. I was looking at</p> <p>23 the existing team, not bringing anyone else onto</p> <p>24 to the team at the -- at that point. So it would</p> <p>25</p> |